



Certification programme

HAYMILK TSG

Applicant group:

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**for milk production operations, for
treatment and processing plants, and for
contract processors**

1. Scope

This certification programme regulates the minimum requirements and procedures to control the specific character as stated in the product specification of the Annex to the Commission Implementing Regulation (EU) No 304/2016 of 2 March 2016 for entering a name in the register of traditional specialities guaranteed (Heumilch/Haymilk/Latte fieno/Lait de foin/Leche de heno (TSG)).

2. Programme participants

The programme participants are:

- ARGE Heumilch Österreich as the programme owner (applicant group)
- Accredited certification bodies according to the requirements stated in ISO/IEC 17065 as control bodies for this programme
- Processors (dairies, cheese manufacturers, etc.) as certification applicants
- Producers (agricultural milk production operations) as suppliers to processors and
- Other contractors such as contract processors, packing companies, filling companies, etc.

3. Additional requirements

In addition to the Commission Implementing Regulation (EU) No 304/2016 stated in point 1, the following are applied in this programme:

- Commission Implementing Regulation (EU) No 668/2014 of 13 June 2014 laying down rules for the application of Regulation (EU) No 1151/2012 of the European Parliament and of the Council on quality schemes for agricultural products and foodstuffs
- Commission Delegated Regulation (EU) No 664/2014 of 18 December 2013 supplementing Regulation (EU) No 1151/2012 of the European Parliament and of the Council with regard to the establishment of the Union symbols for protected designations of origin, protected geographical indications and traditional specialities guaranteed and with regard to certain rules on sourcing, certain procedural rules and certain additional transitional rules
- Regulation (EC) No 1829/2003 on genetically modified food and feed and Regulation (EC) No 1830/2003 concerning the traceability and labelling of food and feed products produced from genetically modified organisms.
- For haymilk products from organic production and their products that are labelled as organic, the Regulation (EC) No 834/2007 shall also apply

4. Object of the certification

The object of the certification is the products marketed by processors (dairies, cheese manufacturers, etc.) with the labelling 'Haymilk TSG' and the symbol applied according to Commission Implementing Regulation (EU) No 668/2014 such as:

- Milk
- Cheese
- Butter
- Other milk products

The control applies to producers (agricultural milk production operations), processors (dairies, cheese manufacturers, etc.) and other contractors.

5. Approval of the certification body

Certification bodies are approved by the responsible authority according to Article 36 of Regulation (EU) No 1151/2012.

6. Application for certification

Processors and contract processors can submit an application for certification to a certification body that has been accredited for the Implementing Regulation (EU) No 304/2016. The application must contain the following at minimum:

- Name and address
- Responsible contact with contact details
- Description of the holding including quality control
- The product(s) that is/are produced from haymilk and marketed (Annex E)
- The permanent establishments that are to be controlled, with EU health mark (identification mark) according to Regulation (EU) No 853/2004
- Where applicable, the supplying producer holdings including the registration number
- All other contractors

7. Control agreement

Once the certification body has checked and clarified the feasibility of the application, it is necessary to conclude a control agreement that states all rights and obligations of both sides in such a manner that the relevant requirements of ISO/IEC 17065 are met. The control agreement must contain schemes to ensure that the rights and obligations are imposed on all supplying producers and other contractors involved.

8. Control

8.1 Producers

8.1.1 Requirements

For each producer, a control must be performed on site by the certification body in the course of the initial survey. As part of this control, it must be established whether the requirements stated in point 3.6 of the Implementing Regulation (EU) No 304/2016 have been met. The checklist in Annex A must be used for this purpose. An initial survey is required in order to complete a risk assessment of the producer holding.

8.1.2 Non-compliance in the course of the initial survey

If deficiencies are identified, these must be documented and categorised according to the list of penalties in Annex D and the corresponding deadlines for the rectification of the deficiencies must be imposed.

8.1.3 Risk classification

On the basis of the evidence collected and documented during the initial survey, a risk classification must be performed using a 4-level risk profile (if the risk class is 0, it must be ensured that each holding is controlled at least once within a period of 4 years. For risk class 1, this must take place within a period of 2 years. For every control with a negative result, an additional control must be performed.):

- Risk class 0 = minimal risk (25% control)
- Risk class 1 = low risk (50% control)
- Risk class 2 = medium risk (100% control)
- Risk class 3 = high risk (no certification possible)

There is a minimal risk (risk class 0) if the feeding/mixing/storage processes only feature the use of products or cultures in animal husbandry that cannot be genetically modified (e.g. minerals) or that do not have EU market approval for their genetically modified variants (e.g. Wheat), if only raw materials that are not subject to compulsory

identification according to Regulation (EC) No 1829/2003 are used and if only GM feed that is not interchangeable is used at the holding (non-interchangeable feed is feed produced for a species different to the species (family or subfamily) involved in the certified production sector. For example, laying hen feed is non-interchangeable for the production of GMO-free milk; however, cattle fattening feed is interchangeable as it applies to the same species (family: bovids, subfamily: cattle). The opposite would apply if certification were to be performed for laying hens.

Risk classification is also possible if only feed that is suitable for the production of GMO-free food, features the corresponding identification and is subject to a control system is used. If critical raw materials originate from countries in which GMOs are approved for cultivation and are cultivated, these must be certified as GMO-free by an accredited certification body.

There is a low risk (risk class 1) if interchangeable non-compliant feed is present on the farm but the use of different systems (e.g. mixers, screws, storage rooms, stalls) during feeding/mixing/storage and/or internal feed transport ensures that contamination can be prevented.

Raw materials must not be subject to compulsory identification according to Regulation (EC) No 1829/2003 and must originate from GMO-free cultivation. If critical raw materials that are used originate from countries in which GMOs are approved for cultivation and are cultivated, it must be documented on the purchase order and/or delivery note that these originate from GMO-free cultivation.

There is a medium risk (risk class 2) if the same systems (e.g. mixers, screws, storage rooms, stalls) are used during feeding/mixing/storage and/or internal feed transport and if this could lead to contamination. It is assumed that there is a risk, but that this can be minimised by means of suitable measures.

If the risk cannot be minimised by means of suitable measures, the holding cannot be certified (risk class 3). Raw materials must not be subject to compulsory identification according to Regulation (EC) No 1829/2003.

There is also a medium risk if an agricultural holding (producer) operates contrary to the rules of haymilk production in defined production units of distinct production sectors.

There is a high risk (risk class 3) if it is assumed during feeding/mixing/storage and internal feed transport that the risk of mixing with non-approved feed is high. No certification is possible.

8.2 Processors

8.2.1 Requirements

For each processor, a control must be performed on site by a certification body in the course of the initial survey. This certification body must establish whether:

- a. The specifications entered in the description of the holding correspond to the actual processes and procedures.
- b. The requirements stated in the Implementing Regulation (EU) No 304/2016 have been met. The checklist in Annex B must be used for this purpose.

8.2.2 Non-compliance in the course of the initial survey

If deficiencies are identified, these must be documented and categorised according to the list of penalties in Annex D and the corresponding deadlines for the rectification of the deficiencies must be imposed.

8.2.3 Control

Ongoing controls must be performed by a certification body at least once a year.

8.3 Contractors

8.3.1 Requirements

For each contractor, a control must be performed on site by a certification body in the course of the initial survey. This must establish whether the requirements stated in the Implementing Regulation (EU) No 304/2016 have been met. The checklist in Annex C must be used for this purpose.

8.3.2 Non-compliance in the course of the initial survey

If deficiencies are identified, these must be documented and categorised according to the list of penalties in Annex D and the corresponding deadlines for the rectification of the deficiencies must be imposed.

8.3.3 Control

Ongoing controls must be performed by a certification body at least once a year.

9. Certification

Upon full completion of the initial survey, control and certification, the applicant must be issued with a certificate specifying the products or product groups to which the certification applies as well as the certified establishments.

For the purpose of marketing or declaration of the goods, a product shall bear an identification on its packaging and on the commercial documents accompanying the goods. The connection between the goods and the commercial papers (e.g. delivery note) must be ensured. This requirement relating to the identification does not apply merely to the product upon handover to the final consumer; instead, it applies continuously to the entire production chain.

This means that a clear reference and the name of the control body must be attached in direct contact with the product (packaging, container, means of transport of the product) or to the commercial papers accompanying the goods, thereby ensuring mutual allocation at all times.

10. Contractual agreements

Processors and contractors conclude an agreement with an approved certification body.

11. Monitoring

The certification that has been issued is monitored on an annual basis as part of the control. The certificates of the processors and contractors are submitted to the programme owner on an annual basis.

If misuse of a valid certificate is recorded, the programme owner shall take appropriate measures in accordance with Regulation (EU) No 1151/2012. If the use of an invalid certificate is recorded, the holding will be prompted to subsequently submit a valid certificate. If a valid certificate cannot be submitted, the following measures shall be taken:

- Dispatch of a registered letter to the holding, imposing a ban on marketing
- Notification of the responsible authority and other authorised bodies

12. Publication of the certificates

The certified companies (processors and contractors) are published on the website of the programme owner (www.heumilch.at).

13. Changes to the scope and reporting obligations

The processor and/or the contractor commit to informing the certification body immediately in writing of any significant changes to the holding with respect to the specifications in the description of the holding.

They commit to informing the programme owner and the certification body immediately in writing if they withdraw from the control system, or if the holding or part thereof that is subject to control is passed on to a different legal entity or if its continued operation is taken on by a different legal entity.

In addition, they commit to ensuring that all rights and obligations resulting from the respective agreement(s) that has/have been concluded are imposed on the legal successor.

The certification body shall implement additional steps (potentially involving repeat control and certification), issuing a new certificate if required.

14. Objections, appeals and complaints

The transparency of the activities is very important to the programme owner and the certification bodies. If any uncertainties should arise with respect to the control and certification activity, it is possible to establish contact verbally, in writing or via e-mail. Companies, contractors and third parties are able to lodge objections and appeals in writing against decisions relating to inspections and certifications. The case will be reviewed once again in accordance with the double-checking principle. Further processing will be performed by independent persons. The person who made the decision must not play a leading role with respect to the subsequent decisions. For legal reasons, specific objections or appeals must reach the certification bodies in writing within 14 days.

In addition, processors and contractors are obligated to record complaints made by third parties with respect to the control and certification activity. They are obligated to report these to the certification body immediately in writing and to resolve them. This will be subject to a check, with further measures being implemented according to the situation.

15. Changes to the programme

Changes to the programme are published on the website of the programme owner (www.heumilch.at).

Annex A: checklist for the control of the milk suppliers

Point	Points of inquiry	Comments	Consequences of non-compliance	Deadline
1	No animals or feed which are to be identified as 'genetically modified' under prevailing legislation may be used	The individual control guidelines of each control body can be used, or confirmation by a control body	List of penalties of the control bodies F/R: P4: temporary ban on marketing, ending 14 days after the removal of the prohibited animals and feed; increase of the risk class by 1 level	Immediately
2	No silage may be produced, stored or used as feed anywhere on the entire agricultural holding; this also applies to moist hay and fermented hay	Applies to the entire agricultural holding	Verified as being only the production of silage: F: P4: temporary ban on marketing until the removal of the silage; increase of the risk class by 1 level (R: P4) Feeding of silage: F/R: P4: temporary ban on marketing, ending 14 days after the removal of the silage; increase of the risk class by 1 level	Immediately Immediately
2 a	An agricultural holding can however be divided into clearly defined production units, which do not all have to be managed according to the rules of haymilk production. They must be divided according to distinct production sectors	The sites must be divided spatially and in a manner that is traceable for the control body Cattle fattening is another production sector, for example; however, the rearing of young cows forms part of dairy cattle farming	F: P4: temporary ban on marketing until traceable spatial division; (R: P4)	Immediately

2 b	If, pursuant to 2a, not all production units of an agricultural holding are fully managed according to the rules of haymilk production, the operator must keep the animals separate and keep appropriate records to show this	<p>The sites must be divided spatially and in a manner that is traceable for the control body</p> <p>Cattle farming and the transport of cattle between the production holdings must be documented in a traceable manner</p>	<p>F: P4: temporary ban on marketing until traceable spatial division; (R: P4)</p> <p>Deficiencies in the documentation: F: P2: increased recording and reporting obligations; R: P4: temporary ban on marketing until the removal of the forbidden feed</p>	<p>Immediately</p> <p>Immediately</p>
3	Other feeding provisions for haymilk are observed	<p>Animals may not be fed by-products from breweries, distilleries, fruit pressing, or other by-products from the food industry, such as wet brewer's grains or wet cuttings</p> <p>Exception: dry cuttings as a by-product of sugar manufacturing, and dry protein feed produced during grain processing</p> <p>Animals may not be fed any form of wet fodder</p> <p>Animals may not be fed products of animal origin (milk, whey, meat-and-bone meal, etc.), except milk and whey (products) for young cows</p> <p>Animals may not be fed kitchen waste, garden waste, fallen fruit, potatoes or urea</p> <p>Roughage must make up at least 75% of the yearly ration of dry feed (Annex F)</p>	<p>F: P1: warning and removal of the forbidden feed</p> <p>R: P4: temporary ban on marketing until the removal of the forbidden feed</p> <p>Increase of the risk class by 1 level</p>	Immediately
4	Fertilisation conditions	The use of sewage sludge, sewage sludge products, or compost from municipal treatment plants is prohibited on all areas agriculturally exploited by the milk	<p>F/R: P4: products may not be identified with 'Haymilk TSG'</p> <p>F: P1: warning</p>	Immediately

		<p>supplier However, compost with green cuttings, bush cuttings and organic waste bin contents may be used if the compost manufacturer participates in a quality assurance system and is certified for this purpose.</p> <p>Milk suppliers must wait at least 3 weeks after manure spreading before use of land to graze livestock This must be checked by querying with the milk supplier.</p>	<p>R: P3: post control subject to charge</p> <p>F: P1: warning</p> <p>R: P3: post control subject to charge</p>	<p>Immediately</p> <p>Immediately</p>
5	<p>Use of chemical auxiliary substances</p> <p>Use of chemical auxiliary substances cont.</p>	<p>Only the selective use of synthetic chemical pesticides under the expert supervision of agronomic specialists, and the targeting of specific sites in any of the green fodder areas of the dairy farm is permitted This means that the targeting of specific sites in green fodder areas without agronomic specialists is permitted</p> <p>Any use that goes beyond this requires special instructions for the pasture with written confirmation</p> <p>Permitted fly sprays may be used in dairy stalls only when the mother cows (lactating cows) are absent Potential use must be checked by querying with the milk supplier.</p>	<p>F: P1: warning</p> <p>R: P3: post control subject to charge</p>	<p>Immediately</p>

6	The delivery prohibitions must be observed in the context of calving, purchase of lactating cows and alpine farming	<p>Delivery prohibitions Milk may not be delivered within 10 days after calving</p> <p>When lactating cows that have been fed silage are purchased, there must be a waiting period of least 14 days</p> <p>In the case of mountain pastures/Alpine pastures with cows from holdings that cultivate silage, a changeover period of 14 days before or on the mountain pasture/Alpine pasture must be observed. Milk produced on Alpine pastures can be transported to the holding provided that no cows are milked at the holding that features silage production</p> <p>These points must be checked by querying with the milk supplier.</p>	<p>F: P1: warning</p> <p>R: P3: post control subject to charge</p>	Immediately
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Annex B: checklist for processors

Point	Points of inquiry	Comments	Consequences of non-compliance	Deadline
1	<p>Haymilk products are produced exclusively from certified haymilk and/or certified haymilk products</p> <p>Haymilk products must not contain any other “comparable ingredient” (i.e. any milk other than certified haymilk).</p>	<p>Minor deficiencies in the documentation with respect to traceability, storage tank identification, etc.</p> <p>Major deficiencies in the documentation with respect to traceability, storage tank identification, etc.</p> <p>Mixing with non-certified haymilk or silage milk cannot be ruled out</p>	<p>F: P1: warning</p> <p>F: P3: post control subject to charge (R: P4)</p> <p>F/R: P4: products may not be identified with ‘Haymilk TSG’</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p>
2	<p>Haymilk products do not feature the use of any ingredients which are to be identified as ‘genetically modified’ under prevailing legislation</p>	<p>The individual control guidelines of each control body can be used, or confirmation by a control body</p>	<p>List of penalties of the control bodies</p> <p>F/R: P4: products may not be identified with ‘Haymilk TSG’</p>	

In the event that ‘Haymilk TSG’ is marketed in the form of raw milk that has only been cooled and is not subject to any other form of processing, certified milk suppliers do not require additional certification as processors for this purpose.

Annex C: checklist for contractors

Point	Points of inquiry	Comments	Consequences of non-compliance	Deadline
1	<p>Haymilk products are produced exclusively from certified haymilk and/or certified haymilk products</p> <p>Haymilk products must not contain any other “comparable ingredient” (i.e. any milk other than certified haymilk).</p>	<p>Minor deficiencies in the documentation with respect to traceability, storage tank identification, etc.</p> <p>Major deficiencies in the documentation with respect to traceability, storage tank identification, etc.</p> <p>Mixing with non-certified haymilk or silage milk cannot be ruled out</p>	<p>F: P1: warning</p> <p>F: P3: post control subject to charge (R: P4)</p> <p>F/R: P4: products may not be identified with ‘Haymilk TSG’</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p>
2	<p>Haymilk products do not feature the use of any ingredients which are to be identified as ‘genetically modified’ under prevailing legislation</p>	<p>The individual control guidelines of each control body can be used, or confirmation by a control body</p>	<p>List of penalties of the control bodies</p> <p>F/R: P4: products may not be identified with ‘Haymilk TSG’</p>	

Annex D: list of penalties for 'Haymilk TSG'

This list of penalties is intended to clarify the individual penalties that are to be imposed in the event of infringements. The measures for rectifying a penalty and a potential deadline for this to be achieved are additionally stated in the inspection report.

Penalty 1: warning

The warning is issued in the event of minor infringements and is usually accompanied by a deadline.

Penalty 2: increased recording and reporting obligations

This penalty necessitates improvements with respect to recordings/traceability or the subsequent submission of documents. It is also usually issued with a deadline.

Penalty 3: post control subject to charge

The post control that is subject to charge can be issued for all infringements falling under penalty 1 and 2 in the event of repeat infringement. It is particularly useful if the rectification of deficiencies is required by a certain deadline and must be checked. This penalty is also issued in the event of deficiencies that are major but do not yet result in the exclusion of the lot.

Penalty 4: temporary ban on marketing as 'Haymilk TSG'

Exclusion of the affected lot from marketing with the 'Haymilk TSG' identification or as 'Haymilk TSG' from a milk producer.

This penalty is issued if a product or a holding needs to be excluded from marketing with reference to the legal basis. The duration of the ban on marketing for the product or the holding must be agreed with the programme owner (applicant group).

Penalty 5: exclusion from 'Haymilk TSG' certification programme

Exclusion from the 'Haymilk TSG' certification programme by agreement with the programme owner (applicant group). The responsible authority shall be informed of this. Mutual termination of the control agreement in compliance with the deadline does not constitute penalty 5.

Abbreviations:

F ... first instance

R ... repeat instance

P ... penalty

Annex F: roughage regulation

Haymilk production is a form of pasture-based milk production. The feed used for summer feeding consists of pastures, mountain pastures and meadow grass as well as permitted feed according to Implementing Regulation (EU) No 304/2016 for entering 'Haymilk TSG' in the register of traditional specialities guaranteed, point 3.6 'Heumilchregulativ'. Winter feeding is performed using hay and permitted feed according to Implementing Regulation (EU) No 304/2016 for entering 'Haymilk TSG' in the register of traditional specialities guaranteed, point 3.6 'Heumilchregulativ'. There is a complete, year-round ban on the feeding of fermented feed.

The proportion of roughage in the annual dry feed ration must be at least 75%. To provide balance in the ration and to provide vitamins, concentrated feed can be used as a supplement. In cattle feeding, the average quantity of concentrated feed at a holding is therefore limited to a maximum of 25% of the total yearly intake of dry matter.

How is the concentrated feed calculation performed for cattle?

With a milk output of 5,500 kg, a cow has an intake of 5,500 kg of feed per year in the form of dry matter (DM).

Total feed intake in kg DM/year	Lactation performance (305 d)	Feed intake factor	25% DM/year	Concentrated feed (CF) with 88% DM per year
5,500 kg	Up to 5,500 kg	1.0	1,375 kg	1,560 kg CF

In the event of a higher milk output, the dry matter intake also increases. The feed intake factor is therefore raised by 0.1 for every 500 kg that the milk output is higher.

Lactation performance (305 d)	Feed intake factor	Conc. feed per CU (25%) per year
Up to 5,500 kg	1.0	1,560 kg
5,501 - 6,000 kg	1.1	1,715 kg
6,001 - 6,500 kg	1.2	1,870 kg
6,501 - 7,000 kg	1.3	2,030 kg
7,001 - 7,500 kg	1.4	2,185 kg
7,501 - 8,000 kg	1.5	2,340 kg
8,001 - 8,500 kg	1.6	2,495 kg
8,501 - 9,000 kg	1.7	2,650 kg
Over 9,000 kg	1.8	2,810 kg

How is the maximum quantity of concentrated feed at the haymilk holding calculated?

Example holding: 15 CUs consisting of young bovine animals, cattle for fattening and mother cows

20 dairy cows, 6,120 kg of milk is the stall average according to the milk output control

25% CF regulation	Number of CUs	Conc. feed per CU	Total kg conc. feed
Young bovine animals, mother cows	15	1,560 kg	23,400 kg
Dairy cows, 6,120 kg stall average	20	1,870 kg	37,400 kg
Total quantity of concentrated feed			60,800 kg

With the 25% regulation, this holding may use a maximum of 60,800 kg of concentrated feed per year.

How can adherence to the 25% concentrated feed guideline be controlled at the above holding?

Purchase of conc. feed	Own conc. feed	Total conc. feed	Prior stocks 01/01/2019	Remaining stocks 31/12/2019	Fed conc. feed
6 x 4,800 kg 28,800 kg	4 ha, each 5,500 kg 22,000 kg CF	50,800 kg CF	7,000 kg	14,000 kg	43,800 kg

Explanations:

+ For mother cows, nurse cows, young bovine animals and cattle for fattening, the feed intake factor is 1.0

+ For dairy cows, the feed intake factor depends on the milk output; the stall average from the output control is applied for the milk output. For holdings without a milk output control, the stall average is calculated from the delivered milk, other marketing and calf-feeding milk:

- The cattle units (CUs) are determined according to the following list of animals:
 - Cattle under 6 months 0.4 CUs per animal
 - Cattle from 6 months to 2 years 0.6 CUs per animal
 - Cattle above 2 years 1.0 CU per animal
- Definition of roughage: all feed listed below counts as roughage (staple feed)
 - Feed from permanent and temporary meadows, pastures and mountain pastures, fresh and dried (hay)
 - Arable crops in cases where the entire plant is fed as green fodder or dried
 - Straw
 - Grass meal pellets, maize pellets and alfalfa pellets
 - Unprocessed fodder beet
 - Milk and milk replacer for young cows

All feed **not** listed here counts as concentrated feed.

- The crucial factor is that the concentrated feed quantity is calculated not for the individual animal but for the entire animal population and it is applied to the dry matter intake per year.

Organic haymilk suppliers must additionally observe the agreed guidelines for organic farming.